

BRODIE, J.

LEVY, M.J.

EAG:MKM
F. #2018R02189

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

ANTHONY PANDRELLA,

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Hobbs Act Robbery)

1. On or about October 26, 2018, within the Eastern District of New York, the defendant ANTHONY PANDRELLA did knowing and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by the robbery in Brooklyn, New York, of Vincent Zito, an individual engaged in the business of extending and collecting extensions of credit.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO

(Unlawful Use and Possession of a Firearm)

2. On or about October 26, 2018, within the Eastern District of New York, the defendant ANTHONY PANDRELLA did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the crime charged in Count One,

INDICTMENT

CR 19 122

Cr. No.

(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(c)(1)(A)(iii),
924(j)(1), 981(a)(1)(C), 1951(a) and
3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

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U.S. DISTRICT COURT E.D.N.Y.
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BROOKLYN OFFICE

and did knowingly and intentionally possess such firearm in furtherance of said crime of violence, which firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii) and 3551 et seq.)

COUNT THREE

(Causing Death Through Use of a Firearm)

3. On or about October 26, 2018, within the Eastern District of New York, the defendant ANTHONY PANDRELLA, in the course of a violation of Title 18, United States Code, Section 924(c), to wit: the crime charged in Count Two, did knowingly and intentionally cause the death of a person through the use of a firearm, which killing was a murder as defined in Title 18, United States Code, Section 1111(a), in that the defendant, with malice aforethought, did unlawfully kill Vincent Zito willfully, deliberately, maliciously and with premeditation, and in the perpetration of a robbery, to wit: the crime charged in Count One.

(Title 18, United States Code, Sections 924(j)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

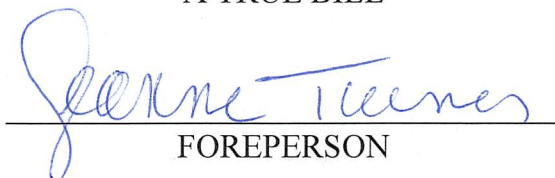
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK


BY: _____
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

F #: 2018R02189
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

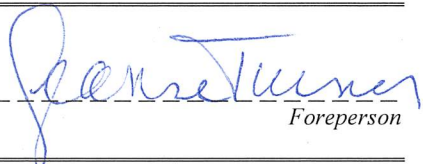
ANTHONY PANDRELLA,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii),
924(j)(1), 981(a)(1)(C), 1951(a) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

A true bill.


Foreperson

Filed in open court this _____ day of _____ A.D. 20 _____

Clerk

Bail, \$ _____

M. Kristin Mace, Assistant U.S. Attorney (718) 254-6879